



U.S. Department of Justice

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RMT/DMP/SK/AC
F.#2015R00600

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September 18, 2017

By ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Muhanad Mahmoud al Farekh
Criminal Docket No: 15-268 (S-2) (BMC)

Dear Judge Cogan:

The government respectfully writes to respond to the defendant's letter, filed earlier today, seeking preclusion of expert opinion testimony on the process of radicalization. In response to the Court's comments today regarding the scope of such testimony, the government has narrowed the anticipated testimony regarding radicalization.

Specifically, the government now anticipates that Dr. Vidino will provide limited testimony on radicalization in which he will briefly define radicalization, explain that there is no "profile" or commonly observed characteristics of an individual who may be susceptible to radicalization, and state that radicalization can occur in the absence of direct, personal contact with a terrorist organization. Dr. Vidino will not comment specifically on the defendant's radicalization, nor will he offer testimony that the defendant fits within any particular pattern of radicalization.

Rather, the government will offer Dr. Vidino's testimony to educate the jury and to address any preconceived notions that may exist concerning radicalization, including dispelling any notion that there may be a "typical" profile of an individual who may be susceptible to radicalization.

The government respectfully requests that the Court permit such limited testimony on radicalization pursuant to Federal Rule of Evidence 702.

